

Message

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**From:** Echeverria, Marietta [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=36C56B7169144626BD6AADEA25992D4E-MARIETTA ECHEVERRIA]  
**Sent:** 7/22/2021 9:53:28 PM  
**To:** Tindall, Kelly [tindall.kelly@epa.gov]  
**Subject:** Fwd: Today's 24(c) meeting?

FYI - we had a discussion with MS about 24c today. The email exchange below between Mike/Michal/Jake give you a sense of at least one question they will have. Let's keep these in mind as we plan for state and academic meetings

Sent from my iPhone

Begin forwarded message:

**From:** "Goodis, Michael" <Goodis.Michael@epa.gov>  
**Date:** July 22, 2021 at 5:33:00 PM EDT  
**To:** "Echeverria, Marietta" <Echeverria.Marietta@epa.gov>  
**Subject:** FW: Today's 24(c) meeting?

FYI

Michael L. Goodis, P.E.  
Acting Deputy Director for Programs  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
571-309-5497 (cell)

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**From:** Li, Jake <Li.Jake@epa.gov>  
**Sent:** Thursday, July 22, 2021 5:26 PM  
**To:** Goodis, Michael <Goodis.Michael@epa.gov>; Freedhoff, Michal <Freedhoff.Michal@epa.gov>  
**Subject:** RE: Today's 24(c) meeting?

Sounds good.

I was also wondering whether an earlier cutoff date would create major pushback from growers by limiting them to only one OTT application. But I see that for soybean, only 8% of acres averaged two applications in 2019.

In 2019 in the U.S., an average of two applications of OTT dicamba were made to 40% of the cotton acres treated with dicamba and 8% of the soybean acres treated with dicamba (Orlowski and Kells, 2020a & b). The Agency did not assess the impact of reducing the number of applications so the impact on risk has not been estimated (USEPA. 2020c) but limiting the number of applications can be expected to decrease risk, generally

Looking forward to the dialogue you mentioned, Michael.

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**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Sent:** Thursday, July 22, 2021 4:46 PM  
**To:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>; Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>  
**Subject:** RE: Today's 24(c) meeting?

Jake – you beat me to it – was looking for the same chart.

Also keep in mind that symptoms of dicamba damage to other crops generally does not show up until about 2 weeks after exposure.

We plan to loop back with you before we talk with the states and can discuss this further then.

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**From:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>  
**Sent:** Thursday, July 22, 2021 4:34 PM  
**To:** Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: Today's 24(c) meeting?

Ty – and I believe one option discussed in the context of the 2020 decision was to make the cut-off date for both crops the earlier of the two, so the q would be whether we might be able to answer that question better after the summer.

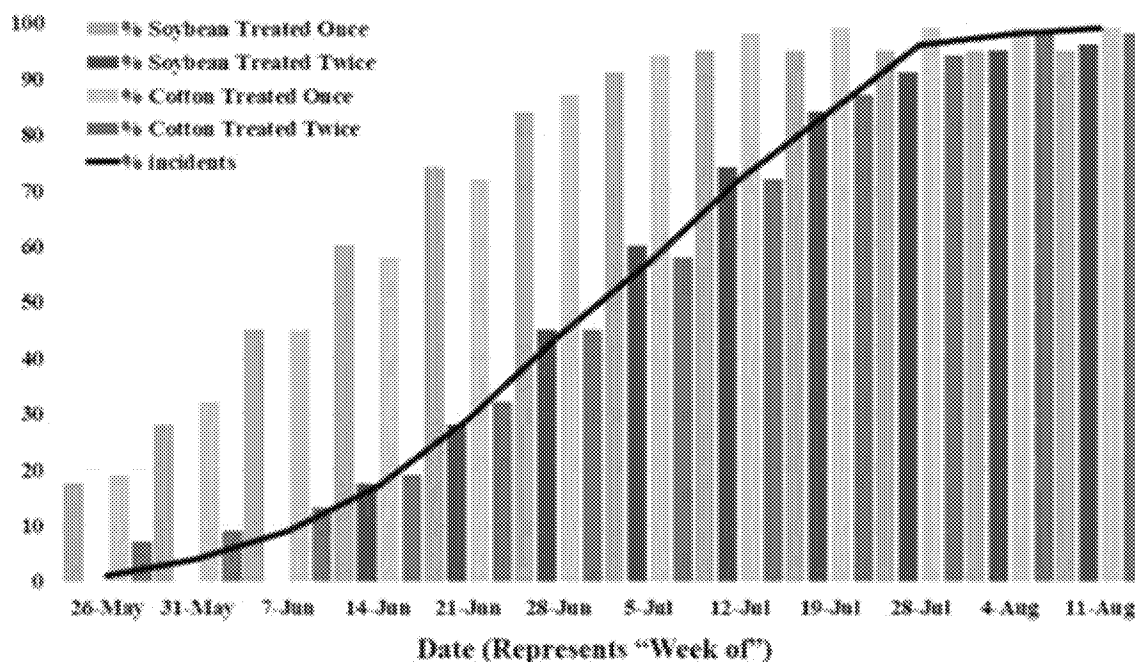
Michal Ilana Freedhoff, Ph.D.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
[Freedhoff.michal@epa.gov](mailto:Freedhoff.michal@epa.gov)

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**From:** Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>  
**Sent:** Thursday, July 22, 2021 4:30 PM  
**To:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: Today's 24(c) meeting?

I was wondering the same during the meeting and found this information in our October 2020 memo on impacts and incidents.

BEAD does not have state level incident data to determine the impacts of these state level restrictions but when viewed on a national level a May 25th cutoff date would be before any incidents occur, a June 20th cutoff date would be before 70% of incidents occur, and a June 30th cutoff date would be before 60% of the incidents occur.



**Figure 2. National incidents and cutoff dates for the one and two over-the-top applications of dicamba to cotton and soybean.**

Source: Crop Progress Reports for 2015 – 2019 (USDA-NASS, 2020a) and Incident data for 2018 and 2019 (Miller, 2020).

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**From:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>

**Sent:** Thursday, July 22, 2021 3:17 PM

**To:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>

**Subject:** RE: Today's 24(c) meeting?

Would be interesting to know whether the earlier cut off date for both crops would have avoided damages

Michal Ilana Freedhoff, Ph.D.  
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 Office of Chemical Safety and Pollution Prevention  
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**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Sent:** Thursday, July 22, 2021 1:08 PM

**To:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>; Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>

**Subject:** RE: Today's 24(c) meeting?

Perfect – thanks

I think your participation on the call sends a very positive and significant message that MS's concerns are heard 'at the top'. Thanks for doing this.

Michael L. Goodis, P.E.  
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**From:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>  
**Sent:** Thursday, July 22, 2021 1:01 PM  
**To:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>  
**Subject:** RE: Today's 24(c) meeting?

Great – what I was going to do to open up discussion was note IG, note incident reports for this year, note overarching interest agency has in preserving tools for all states, but concern for litigation etc. That said, we do recognize the strain the state has been under and turn to the program to describe how we tried to evaluate? That sound ok?

Michal Ilana Freedhoff, Ph.D.  
Assistant Administrator  
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**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Sent:** Thursday, July 22, 2021 12:56 PM  
**To:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>; Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>  
**Subject:** RE: Today's 24(c) meeting?

It is scheduled from 3-3:30 pm today.  
Michal – you should have it on your calendar – let me know if you do not but I see you on the invite list.  
Jake – I just forwarded the invite to you.

Also getting word from Reg 4 that the Commissioner will listen to EPA's rationale and not seek to do anything to jeopardize the relationship between our offices – which is good news.

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**From:** Freedhoff, Michal <[Freedhoff.Michal@epa.gov](mailto:Freedhoff.Michal@epa.gov)>  
**Sent:** Thursday, July 22, 2021 12:50 PM  
**To:** Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** Re: Today's 24(c) meeting?

Totally happy for you to join! Hasn't been scheduled yet to my knowledge, but am copying Mike so he can be sure we are both added to the calendar invite.

Sent from my iPhone

On Jul 22, 2021, at 12:45 PM, Li, Jake <[Li.Jake@epa.gov](mailto:Li.Jake@epa.gov)> wrote:

It just occurred to me whether you think I should attend the 24(c) meeting this afternoon, as we think about opportunities to shift more of your FIFRA workload to me. I'm happy to stay in the SLC meeting, but if you think it's helpful for me to appear in the 24(c) meeting as a segue to our future work, I'm guessing it'll be fine for me to hop off the SLC call briefly.

Ya-Wei (Jake) Li  
Deputy Assistant Administrator for Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
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